

James S. Bell (252662)
JAMES S. BELL, P.C.
2808 Cole Avenue
Dallas, TX 75204
Telephone: (214) 668-9000
Email: james@jamesbellpc.com
Attorney for Defendant Matthew H. Peters

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

MATTHEW H. PETERS, BAYVIEW
SPECIALTY SERVICES LLC,
COASTLINE SPECIALTY
SERVICES LLC, STRAND VIEW
CORPORATION, INNOVATIVE
SPECIALTY SERVICES LLC,
PARAGON PARTNERS LLC (D/B/A
PARAGON MEDICAL PARTNERS),
CARDEA CONSULTING LLC, PRAXIS
MARKETING SERVICES LLC,
PROFESSIONAL RX PHARMACY LLC,
INLAND MEDICAL CONSULTANTS
LLC (D/B/A ADVANCED
THERAPEUTICS), PORTLAND
PROFESSIONAL PHARMACY LLC,
SUNRISE PHARMACY LLC,
PROFESSIONAL 205 PHARMACY LLC
(D/B/A PROFESSIONAL CENTER
205 PHARMACY), SYNERGY
MEDICAL SYSTEMS LLC (D/B/A
SYNERGY RX), SYNERGY RX LLC
(D/B/A SYNERGY RX), PRESTIGE
PROFESSIONAL
PHARMACY, JMSP LLC (D/B/A
PROFESSIONAL CENTER 205
PHARMACY), MPKM, LLC (D/B/A

Case No. 2:24-cv-00287-CKD

**STIPULATION TO EXTEND TIME TO
RESPOND TO THE COMPLAINT BY
DEFENDANT MATTHEW H. PETERS
[L.R. 144(a)]**

PROFESSIONAL CENTER
PHARMACY), ONE WAY DRUG LLC
(D/B/A PARTELL PHARMACY),
PARTELL PHARMACY LLC,
OPTIMUM CARE PHARMACY INC.
(D/B/A MARBELLA PHARMACY),
GLENDALE PHARMACY LLC, and
LAKE FOREST PHARMACY (D/B/A
LAKEFOREST PHARMACY),

Defendants.

To: THE CLERK OF COURT AND ALL PARTIES OF RECORD

Plaintiff United States of America, on the one hand, and Defendant Matthew H. Peters, on the other hand, through their respective counsel hereby stipulate as follows:

Defendant Peters hereby respectfully requests an extension of time from April 18, 2024, to May 2, 2024, to respond to the Amended Complaint. This request is made in good faith and not for purpose of delay. Defendant Peters respectfully submits that the requested extension is required for the following reasons:

1. Defendant's response to Plaintiff's Amended Complaint is currently due April 18, 2024. Defense counsel requests additional time to prepare a response to the Complaint, particularly as his colleague who will assist with the response will be office for a family funeral.
2. Pursuant to Local Rule 144(a), the parties hereby agree that the time for Defendant to respond to the Complaint shall be extended to May 2, 2024.

IT IS SO STIPULATED.

1 Dated: April 18, 2024

JAMES S. BELL, P.C.

2 s/James S. Bell

3 James S. Bell

4 State Bar No. 252662

2808 Cole Avenue

Dallas, TX 75204

5 Telephone: (214) 668-9000

6 Email: james@jamesbellpc.com

7 *Attorneys for Defendant Matthew H. Peters*

8 Dated: April 18, 2024

PHILIP A. TALBERT

9 UNITED STATES ATTORNEY

10 s/David E. Thiess

David A. Theiss

11 Assistant United States Attorney

Steven Tennyson

12 Assistant United States Attorney

501 I Street, Suite 10-100

13 Sacramento, CA 95814

14 Telephone: (916) 554-2700

Facsimile: (916) 554-2900

15 Email: David.Thiess@usdoj.gov

16 Email: Steven.Tennyson2@usdoj.gov

17 *Attorneys for the United States of America*

18 **ATTESTATION**

19 In accordance with Civil Local Rule 131(e), I, James S. Bell, have obtained concurrence
20 in the filing of this document from the other signatory listed here.

21 Dated: April 18, 2024

JAMES S. BELL, P.C.

22 s/James S. Bell

23 James S. Bell

24 *Attorneys for Defendant Matthew H. Peters*

PROOF OF SERVICE

United States of America v. Matthew H. Peters, et al.
Case No. 2:24-cv-00287-CKD

STATE OF TEXAS, COUNTY OF DALLAS

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Dallas, State of Texas. My business address is 2808 Cole Avenue, Dallas, TX 75204. On April 18, 2024, I served true copies of the following document(s) described as **STIPULATION TO EXTEND TIME TO RESPOND TO THE COMPLAINT BY DEFENDANT MATTHEW H. PETERS [L.R. 144(a)]** on the interested parties in this action as follows:

David A. Theiss
Assistant United States Attorney
Steven Tennyson
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900
Email: David.Thiess@usdoj.gov
Email: Steven.Tennyson2@usdoj.gov

Attorneys for the United States of America

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on April 18, 2024, at Dallas, Texas.

/s/ Connor Nash
Connor Nash